

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 1997

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Docket No. R97-1

**NEWSPAPER ASSOCIATION OF AMERICA
MOTION TO LEAVE TO FILE ATTACHED INTERROGATORIES
AFTER DISCOVERY CUT-OFF
February 27, 1998**

The Newspaper Association of America respectfully moves for leave to file the attached "Newspaper Association of America Interrogatories to the United States Postal Service (NAA/USPS-22-27)." These interrogatories concern a planned "day-certain" delivery service that the Postal Service apparently plans to begin during the Test Year. Although the deadline for completion of discovery on the USPS was February 17, 1998, NAA became aware of details of this development sufficient to make discovery appropriate only this week and has attempted to prepare the attached interrogatories expeditiously.

The attached interrogatories are reasonably calculated to lead to the discovery of admissible evidence, as the questions seek potentially relevant information regarding cost projections and value of service, if not other criteria of Section 3622(b)(3) and general public policy considerations.

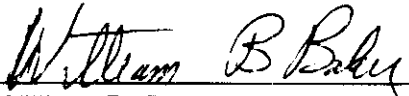
For the foregoing reasons, the Newspaper Association of America respectfully submits that good cause exists to allow it to ask the attached interrogatories, requests

leave to file and serve these interrogatories, and asks for an order directing the Postal Service to submit a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

February 27, 1998


William B. Baker